

ID: CCA_2010041610500937

Number: **201020013**

Office:

Release Date: 5/21/2010

UILC: 6231.05-00

From:

Sent: Friday, April 16, 2010 10:50:12 AM

To:

Cc:

Subject: RE: question

Carryforwards are generally disallowed through computational adjustments rather than through affected item notices of deficiency. See [Bob Hambric Chevrolet](#), 849 F.Supp 500; [Cummings v. Commissioner](#), T.C. Memo. 1996-282; [Olson v. U.S.](#) (2nd Cir)